

MEMORANDUM

To: PCB PS Monitoring Guidance TAC Members

From: Arthur Butt

Date: January 14, 2008

Subject: Summary of January 8, 2008 TAC Meeting at DEQ/PRO

This memo serves to summarize and document the discussions held between the members of the PCB PS Monitoring TAC on January 8th (2008). It is not intended to be a complete record of the meeting minutes. Rather, it serves to document important issues discussed and decisions/recommendations made that day. A list of participants is provided below (alphabetical order):

Dan Barker, HRSD
John Carlock, HRPDC
Sherry Crewe, City of Richmond
Ron Dodson, Bluefield
Chris French, Alliance Ches Bay
Patricia Greek, Quantico
Mason Harper, DCR

Susan Lingenfeler, USFWS
Evelyn Mahieu, UOSA
Mike McEvoy, Western VA Water Authority
Rick Parrish, SELC
Scott Reed, Dominion
Dick Sedgley, AquaLaw (VAMWA Rep)
Andrea Wortzel, VMA

DEQ Staff: Mark Alling, Alan Brockenbrough, Arthur Butt, Craig Lott, Charles Martin
Dave Lazarus, Mark Richards, Alan Pollock Alison Thompson

1. Objective and Review Comments –

Following introductions, the meeting began with a revised agenda and list of materials (Revised Guidance Document with appendices A, B & C; previous meeting minutes, Response to Comments, and list of analytical laboratories). There was a general review of the June 11th meeting and TAC conference calls (July 24 and Aug 10th) regarding industrial facilities. Discussions included: water column criterion vs target threshold values; sampling frequency (wet vs dry), and what constitutes wet for municipals; cumulative loadings. Several points of clarification were noted. TAC members reviewed comments submitted by Hunton & Williams, Dominion, and VAMWA and subsequent emails. This discussion included DEQ's written response(s) including a discussion on a SETAC presentation regarding a validation study for Method 1668A. The study demonstrated the need for good analytical procedures. DEQ staff provided additional updates to the 2003 Validation Study that is scheduled for Draft review release this year.

Action Items: Staff would continue to monitor Method 1668A adoption by EPA.

2. Review of Guidance Document -

Guidance Document review dominated the rest of the morning discussion. Further clarification was needed in the Draft Document to avoid redundancy the Introduction and Background as well as revisions to the definitions. Once again, discussion focused technical issues related to the draft Procedures. Additional clarification was requested for the Facilities and Frequency-Duration sections. In particular the Guidance wasn't specific on monitoring for certain DoD facilities such as Quantico. However, a TMDL has already been developed that includes Quantico in the Potomac PCB TMDL in 2007. As discussed during the June 11th meeting, SIC codes may not be the only factor determining those industrials slated for monitoring, but the SIC codes will provide a list of most probable sources for monitoring. Final recommendations will be determined by the Regional TMDL Coordinator and Permit Writer. Another issue dealt with drought conditions and if the Guidance should be more specific on how to address. While some TAC members thought 18 months was sufficient time to generate samples, others agreed to provide language. Clarification

on the Permit section was solicited, and suggestions were made to include monitoring was being done as part of TMDL development only.

Action Items: TAC members were asked to submit Guidance comments by February 15th. Based on comments received, DEQ staff will determine if another TAC meeting will be scheduled or submit a final draft for TAC review. Will Bullard (Navy/DoD) provided editorial comments that will be included. In addition, DEQ staff would revisit the Permit section and provide options. A revised Guidance will be circulated to TAC members once the February 15th comment period ends.

General Recommendations:

- Improve narrative to figure.
- Permit section should be clear regarding application of Guidance as voluntary with permit reissuance or new permit specifications to include TMDL development monitoring, with a final option available to require monitoring by letter.
- Cite source of Appendix A
- Add Appendix D – Electronic Data Format with example

3. Technical Discussion

Following lunch, TAC members were provided an overview of field and laboratory procedures contained in Appendices B & C. There was discussion of QL (quantification level) and ML (minimal level) as referred to in the EPA method. For consistent terminology with the Method 1668A, the method detection level will be referred to as the Estimated Method Detection Level (EMDL) and the reporting level for quantified data will be identified as the Estimated Minimum Level (EML). With regard to laboratory background, each lab will be required to meet the decision rules specified in Appendix C, Attachment 1; however, if an adequate number of method blanks (n=10) are available from a single lab as they pertain to a specific TMDL project, method blank correction such as that performed in the development of the Tidal Potomac River TMDL can be considered for deriving Waste Load Allocations (WLAs). Other technical issues were discussed as well (e.g., sample shipping temperature of $\leq 6^{\circ}\text{C}$) and will be incorporated into the Standard Operating Procedures. In addition, an Appendix D needs to be added that includes an example of the Electronic Data Format for submittal of PCB point source monitoring data.

Schedule

- Minutes to be prepared and submitted to TAC members,
- Submit comments by February 15th,
- No new meeting date has been scheduled pending comments received.